

06/13/2011

1214812 - R8 SDMS



Third West Substation Comments

Craig Barnitz

to:

Benjamin M. Clegg, Brian King, Mark Christensen, Dave Roskelley

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Cc:

Joyce Ackerman

Hide Details

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To: "Benjamin M. Clegg" <Benjamin.Clegg@PacifiCorp.com>, "Brian King" <Brian.King@PacifiCorp.com>, "Mark Christensen" <Mark.Christensen@PacifiCorp.com>, "Dave Roskelley" <dave@rrenviro.com>

Cc: Joyce Ackerman/R8/USEPA/US@EPA

Brian,

Here are the Draft UDEQ comments to the revised work plan submitted on May 26, 2011. There are still a couple remaining issues that I need to clear with Joyce but I will e-mail those too you as soon as possible.

3.6.3 Dust Control – This section makes several references to "contaminated" dusts. Because the site is located in an area of non-attainment for PM10, the rules set out in Air Quality Rule R307 -309 Non-attainment and Maintenance Areas for PM10: Fugitive Emissions and Fugitive Dust are relevant and appropriate to the site. All dusts originating from any disturbed source area on-site, including clean fill materials, need to be addressed with appropriate dust control measures to prevent the migration of the fugitive dusts off-site.

Appendix B Scope of Work Part V. Training and Certifications – Under the Air Quality Rule R307 -309 Non-attainment and Maintenance Areas for PM10: Fugitive Emissions and Fugitive Dust opacity at the site shall not exceed 10% at the property boundary; and 20% inside the work site. Opacity observations at the site will need to be conducted by the contractor or other person familiar with EPA Method 9.

Appendix B Scope of Work Part X. Completion of Work Section D. 3. – This section again states that contaminated soils will be used as fill. In accordance with comments in the EPA letter, contaminated soils should not be used as fill for this project.

Let me know if you have any questions.

Thanks,

Craig

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